

# Plaintiff's Exhibit B



**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
**HEAD OF THE NOTARY PUBLIC OFFICE NO. 10**  
**CANCÚN, QUINTANA ROO**



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-----NOTARY'S OFFICIAL BOOK-----

- **PUBLIC DEED NUMBER (EIGHT HUNDRED AND FIFTEEN). -(815).** -----

- **VOLUME THREE; BOOK "E".** -----

--I, the undersigned, **FRANCISCO ÓSCAR LECHÓN-RUIZ**, Notary Public, Head of the Notary Public Office number ten in and for the state of Quintana Roo, hereby **CERTIFY** that in the city of Cancun, Municipality of Benito Juarez, State of Quintana Roo in the Mexican United States, this seventh day of the month of August of the year two thousand and twenty, **THE COMMENCEMENT OF THE TESTATE SUCCESSION** of the property of Mr. **TERRENCE HUNTER**, also known as **TERRENCE BLAIR HUNTER** was formalized by Mr. **ROBERT RYAN JOHNSON**, in his capacity as Executor and Trustee, according to the following background, representations and clauses: -----

----- **B A C K G R O U N D** -----

- **ONE.**- By means of a document executed by the Notary Public Brenda Balogh in Vancouver, British Columbia, Canada, on September 1<sup>st</sup> of the year two thousand nineteen, Mr. **TERRENCE HUNTER**, also known as **TERRENCE BLAIR HUNTER** executed his **LAST WILL AND TESTAMENT** in English language and appointed his friend, **ROBERT RYAN JOHNSON** ("ROBERT") as his Executor and Trustee. Such Last Will and Testament was certified by the Consul of Mexico in Vancouver, British Columbia, Canada, Mr. Jacobo Tellez-Ocampo on February twenty-seven of the year two thousand and twenty, and translated into Spanish by Carolina Yépez-Roldán, expert English-Spanish-English translator duly authorized by the Honorable Superior Court of Justice of Mexico City on June twenty-four of the year two thousand and twenty, same that is incorporated into and made a part of this dossier of documents with letter **"A"**. -----

**TWO.**- Mr. **ROBERT RYAN JOHNSON** states under affirmation and represents under perjury that the last address of Mr. **TERRENCE HUNTER**, also known as **TERRENCE BLAIR HUNTER**, was located at Calle Bahía Xaak, Number 47, 77733 Puerto Aventuras, Quintana Roo, Mexico, and that Mr. **TERRENCE HUNTER** died on the third day of September of the year two thousand nineteen in the City of Richmond, as evidenced in the Death Certificate number 30742731 (three, zero, seven, four, two, seven, three, one) dated September eight of the year two thousand nineteen, certified by the Consul of Mexico in Vancouver, British Columbia, Canada, Mr. Jacobo Tellez-Ocampo, on February twenty-seven of the year two thousand and twenty, and translated into Spanish by Carolina Yépez-Roldán, English-Spanish-English expert translator duly authorized by the Honorable Superior Court of Justice of Mexico City on June twenty-four of the year two thousand and twenty, which is incorporated into and made a part of this dossier of documents with letter **"B"**. -----

[stamp of the  
 NOTARY PUBLIC  
 OFFICE NO. 10]

19

NO TEXT

Translation from Spanish into English



**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
**HEAD OF THE NOTARY PUBLIC OFFICE NO. 10**  
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**THREE.** - By means of public deed number eight hundred and fourteen volume three, book "E" dated August seven of the year two thousand and twenty executed by the undersigned Notary Public, **THE NOTARIZATION OF THE LAST WILL AND TESTAMENT** of Mr. **TERRENCE HUNTER**, also known as **TERRENCE BLAIR HUNTER** executed abroad by Mr. **TERRENCE HUNTER**, also known as **TERRENCE BLAIR HUNTER** was registered according to Article one hundred and fourteen and other applicable articles of the Notary Public Act in and for the State of Quintana Roo, at the request of Mr. **ROBERT RYAN JOHNSON**. -----

-- **FOUR.** - By means of the document identified as **SEGOB/SAJ/DGN/0698/2020** (SEGOB, slash, SAJ, slash, DGN, slash, zero, six, nine, eight, slash, two, zero) dated July six of the year two thousand and twenty, issued by the Head of Notaries, a report was filed on the **NON-EXISTENCE** of any testamentary provision in the name of Mr. **TERRENCE HUNTER**, same that is incorporated into and made a part of this dossier of documents with letter "**C**". -----

-- **FIVE.** - By means of the official communication **SEGOB/DGRPPCQR/RPPCBJ/AR/1454/VII/2020** (SEGOB, slash, DGRPPCQR, slash, RPPCBJ, slash, AR, slash, one, four, five, four, slash, VII, slash, two, zero, two, zero) dated July twenty-four of the year two thousand and twenty, issued by the Deputy state representative of the Public Registry of Property and Commerce in Cancun, a report on the **NON-EXISTENCE** of the last will and testament in the name of Mr. **TERRENCE HUNTER** was filed, same that is incorporated into and made a part of this dossier of documents with letter "**D**". -----

-- By virtue of the foregoing, the following clauses are stated: -----

**C L A U S E S** -----

-- **ONE.** - Mr. **ROBERT RYAN JOHNSON**, hereby evidences his acceptance to act as an **EXECUTOR AND TRUSTEE** of the testate succession of the property of Mr. **TERRENCE HUNTER**, also known as **TERRENCE BLAIR HUNTER**, according to the testamentary provisions, and states that he shall perform the terms thereof as set forth and in strict compliance of testator's last will. -----

-- **TWO:** I, the Notary Public, inform the appearing party that, based on the provisions of Article one hundred and forty-three of the Notary Public Act in and for the State of Quintana Roo, I shall decide this case and publish its ruling in two press releases that shall be published in the main newspaper of the State of Quintana Roo. -----

**P E R S O N A L I N F O R M A T I O N** -----

--The appearing party, based on his personal information and under affirmation, states that: -----

--His name is **ROBERT RYAN JOHNSON**, that he was born in Vancouver, Canada on July twenty-seven of the year nineteen seventy-seven, that he is a Canadian citizen by birth, that he is a financial consultant, single, with address at 159 West 2nd Avenue, Apt 1506, Vancouver, BC, Canada V5Y 0L8, and that identifies

NO TEXT

Translation from Spanish into English



**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
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himself with his passport number GK919605 (G, K, nine, one, nine, six, zero, five) issued by the Canadian government. -----

-- **I, THE NOTARY PUBLIC, HEREBY CERTIFY THAT:** I fulfilled with the provisions set forth in Article eighty-nine of the Notary Public Act in and for the State of Quintana Roo; that the appearing party identifies himself with the document submitted in my presence, whose copy is hereto attached under the corresponding letter; that, to the best of my knowledge and belief, he is fully empowered to execute this document, without there being any information to the contrary. Thus, I do hereby state that the appearing party was aware of the legal content of this document, agreed to the same and affixed his hand in my presence for the record. I attest. -----

- - Signature of Mr. **ROBERT RYAN JOHNSON**. - In my presence, Francisco Óscar Lechón-Ruiz. signature.- authorizing seal with the coat-of-arms of the Mexican United States and the text as follows: Francisco Óscar Lechón-Ruiz, NOTARY PUBLIC, HEAD OF THE NOTARY PUBLIC OFFICE NO. 10 IN AND FOR THE STATE OF QUINTANA ROO, MEXICAN UNITED STATES.- Cancún, Municipality of Benito Juárez, State of Quintana Roo, Mexico. -----

-- **FINAL APPROVAL.** - On August twenty-one, of the year two thousand twenty, I approved this public deed as final and conclusive, by virtue of having fulfilled all the legal requirements Pursuant to law. I attest. Francisco Óscar Lechón-Ruiz, Esq.- signature. - Seal of approval. -----

**ATTACHED DOCUMENTS**-----

-- **UNDER LETTER "A".** - A copy of the document containing the **LAST WILL AND TESTAMENT** of Mr. **TERRENCE HUNTER**, composed of fourteen sheets with text. -----

-- **UNDER LETTER "B".** - A copy of the Death Certificate, composed of two sheets with text. -----

-- **UNDER LETTER "C".** - A copy of the document identified as **SEGOB/SAJ/DGN/0698/2020** (SEGOB, slash, SAJ, slash, DGN, slash, cero, six, nine, eight, slash, two, zero, two, zero) composed of two sheets with text. -----

-- **UNDER LETTER "D".** - A copy of the official communication **SEGOB/DGRPPCQR/RPPCBJ/AR/1454/VII/2020** (SEGOB, slash, DGRPPCQR, slash, RPPCBJ, slash, AR, slash, one, four, five, four, slash, VII, slash, two, zero, two, zero) composed of one sheet with text. -----

-- **UNDER LETTER "E".** - A copy of the identification card of the appearing party, composed of one sheet with text. -----

-- **UNDER LETTER "F".** - A copy of the press releases published in the journal, composed of two sheets with text. -----

-- **UNDER LETTER "G".** - A copy of the public deed number eight hundred and fourteen composed of twenty sheets with text. -----

-- I, THE UNDERSIGNED, NOTARY PUBLIC, ISSUED AND DULY COMPARED THE **THIRD TRANSCRIPT** TAKEN FROM THE ORIGINAL DOCUMENT COMPOSED OF FORTY-FOUR SHEETS WITH TEXT, AND THE DOCUMENTS

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

1

On September 1, 2022, the Court received a letter from the Defendant, dated August 31, 2022, in which the Defendant requested that the Court grant summary judgment in its favor on the Plaintiff's Complaint. The Defendant's letter stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff. The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff. The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff.

The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff. The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff. The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff. The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff.

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The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff. The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff. The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff. The Defendant stated that the Defendant had no dispute with the Plaintiff's allegations that the Defendant had engaged in a pattern of discrimination against the Plaintiff.

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Translation from Spanish into English

**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
**HEAD OF THE NOTARY PUBLIC OFFICE NO. 10**  
**CANCÚN, QUINTANA ROO**



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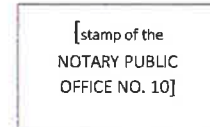
ATTACHED TO THE APPENDIX TO THE BENEFIT OF MR. ROBERT RYAN JOHNSON TO BE USED AS A SUPPORTING DOCUMENT, THIS TWENTY-FIRST DAY OF THE MONTH OF AUGUST OF THE YEAR TWO THOUSAND AND TWENTY IN AND FOR THE STATE OF QUINTANA ROO IN THE CITY OF CANCUN, MUNICIPALITY OF BENITO JUÁREZ. I ATTEST. -----



**HEAD OF THE NOTARY PUBLIC OFFICE NO. 10**  
**IN AND FOR CANCÚN, QUINTANA ROO**

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**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
**LERF-850803-UXO**





NO TEXT



Translation from Spanish into English

**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
**HEAD OF THE NOTARY PUBLIC OFFICE NO. 10**  
**CANCÚN, QUINTANA ROO**



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FOLIO No. SEGOB/SSIZN/0166-ZN/2020

I, THE UNDERSIGNED, JOEL ESPINOZA-MORENO, HEAD OF THE DEPUTY SOCIAL AND INTERINSTITUTIONAL OFFICE IN THE NORTH PART OF THE STATE OF QUINTANA ROO OF THE DEPARTMENT OF THE INTERIOR OF THE EXECUTIVE POWER OF THE STATE OF QUINTANA ROO, MEXICO, PURSUANT TO ARTICLE 31, SECTION XXX OF THE FEDERAL GOVERNMENT ORGANIZATIONAL LAW OF THE STATE OF QUINTANA ROO, ARTICLE 8 AND ARTICLE 45, SECTION XII OF THE INTERNAL ORGANIZATIONAL REGULATIONS OF THE DEPARTMENT OF THE INTERIOR OF THE EXECUTIVE POWER OF THE STATE OF QUINTANA ROO, DO HEREBY-----

----- **C E R T I F Y** -----

THAT THE SIGNATURE ABOVE SUBSCRIBED TO THE ATTACHED INSTRUMENT VERILY BELIEVE TO BE GENUINE OF FRANCISCO ÓSCAR LECHÓN-RUIZ, ESQ. HEAD OF THE NOTARY PUBLIC OFFICE NO. 10 IN AND FOR CANCUN, IN THE MUNICIPALITY OF BENITO JUAREZ IN THE STATE OF QUINTANA ROO, MEXICO WHO WAS FULLY EMPOWERED TO ACT AS SUCH UPON THE ISSUANCE OF THIS INSTRUMENT. -----

THIS CERTIFICATION IS HEREBY ISSUED IN THE CITY OF CANCUN, IN THE STATE OF QUINTANA ROO THIS FIRST DAY OF THE OF THE MONTH OF SEPTEMBER OF THE YEAR TWO THOUSAND AND TWENTY.

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Translation from Spanish into English

**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
**HEAD OF THE NOTARY PUBLIC OFFICE NO. 10**  
**CANCÚN, QUINTANA ROO**



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Copy of the press release whereby the notarial notice was published in the journal named "NOVEDADES" on Monday, August 10, 2020 identified with letter "F" in the Upper left corner

NOTARY PUBLIC OFFICE NO.  
TEN

## NOTARIAL NOTICE FIRST PRESS RELEASE

MR. ROBERT RYAN JOHNSON personally appeared before me, FRANCISCO ÓSCAR LECHÓN-RUIZ, ESQ. head of the notary public office No. 10 in Cancún, Quintana Roo, to claim for the TESTATE SUCCESSION of the property of Mr. TERRENCE HUNTER, by means of the public deed number eight hundred and fifteen, volume three, book "E" dated August seven of the year two thousand and twenty registered in the notary's official book of the notary public office No. 10 headed by me. Additionally, Mr. ROBERT RYAN JOHNSON submitted the death certificate and the last will and testament of Mr. TERRENCE HUNTER, and accepted to act as the Executor and Trustee, upon the testamentary disposition made by Mr. TERRENCE HUNTER. Thus, Mr. ROBERT RYAN JOHNSON shall commence to prepare the inventory and the appraisal of the property comprising the inheritance of Mr. TERRENCE HUNTER, pursuant to Article eight hundred and nineteen of the Rules of Civil Procedure in and for the State of Quintana Roo and to Article one hundred and forty-four of the Notary Public Act in and for the State of Quintana Roo. In light of the aforesaid, I informed Mr. ROBERT RYAN JOHNSON that I shall disclose the foregoing statements by means of two notarial press releases to be published in a journal with ten days of difference each publication, as provided for in Article one hundred and forty-three of the Notary Public Act in and for the State of Quintana Roo.

This 7<sup>th</sup> day of August of the year 2020 in Cancun, Quintana Roo.

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**HEAD OF THE NOTARY PUBLIC OFFICE NO. 10**  
**IN AND FOR CANCÚN, QUINTANA ROO**

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**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
**LERF-850803-UXO**

NO TEXT



Translation from Spanish into English

**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
**HEAD OF THE NOTARY PUBLIC OFFICE NO. 10**  
**CANCÚN, QUINTANA ROO**



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Copy of the press release whereby the notarial notice was published in the journal named "NOVEDADES" on Friday, August 21, 2020 identified with letter "F" in the Upper left corner

NOTARY PUBLIC OFFICE NO.  
TEN

## NOTARIAL NOTICE SECOND PRESS RELEASE

MR. ROBERT RYAN JOHNSON personally appeared before me, FRANCISCO ÓSCAR LECHÓN-RUIZ, ESQ. head of the notary public office No. 10 in Cancún, Quintana Roo, to claim for the TESTATE SUCCESSION of the property of Mr. TERRENCE HUNTER, by means of the public deed number eight hundred and fifteen, volume three, book "E" dated August seven of the year two thousand and twenty registered in the notary's official book of the notary public office No. 10 headed by me. Additionally, Mr. ROBERT RYAN JOHNSON submitted the death certificate and the last will and testament of Mr. TERRENCE HUNTER, and accepted to act as the Executor and Trustee, upon the testamentary disposition made by Mr. TERRENCE HUNTER. Thus, Mr. ROBERT RYAN JOHNSON shall commence to prepare the inventory and the appraisal of the property comprising the inheritance of Mr. TERRENCE HUNTER, pursuant to Article eight hundred and nineteen of the Rules of Civil Procedure in and for the State of Quintana Roo and to Article one hundred and forty-four of the Notary Public Act in and for the State of Quintana Roo. In light of the aforesaid, I informed Mr. ROBERT RYAN JOHNSON that I shall disclose the foregoing statements by means of two notarial press releases to be published in a journal with ten days of difference each publication, as provided for in Article one hundred and forty-three of the Notary Public Act in and for the State of Quintana Roo.

This 7<sup>th</sup> day of August of the year 2020 in Cancun, Quintana Roo.

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**HEAD OF THE NOTARY PUBLIC OFFICE NO. 10**  
**IN AND FOR CANCÚN, QUINTANA ROO**

[handwritten signature]

**FRANCISCO ÓSCAR LECHÓN-RUIZ, Esq.**  
**LERF-850803-UXO**

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MEXICO CITY

**AUTHENTICATION**

I, the undersigned, Carolina Yépez-Roldán, Expert Translator, duly sworn and authorized by the State Supreme Court of Justice in and for Mexico City, as provided for in the Decree *No. 29-01/2018*, issued by the Federal Judiciary Council of Mexico City in the Court Bulletin on the twenty-third day of March of two-thousand and eighteen, [www.iejdf.gob.mx](http://www.iejdf.gob.mx), holding the professional ID card *No. 6755397* issued by the General Bureau of Professional Practice (DGP) of the Department of Public Education (SEP) of Mexico DO HEREBY CERTIFY that, to the best of my knowledge and belief, this certification is a translation into English of the original document in Spanish composed of 7 sheets with text and that the content thereon is true and correct and that I stamped and initialized 5 sheets with text. The original document submitted for translation is composed of 87 sheets with text. However, the pages translated into English were solely pages number: 1-3 and 44-46, as requested.

Authentication ID:

**0482**

IN WITNESS HEREOF, I execute this document and have hereunto set my hand and cause the seal to be affixed to this certification in Mexico City this

**28****September****20**

\_\_\_\_<sup>th</sup> day of \_\_\_\_\_ of the year 20\_\_\_\_.

Signature  
CAROLINA YÉPEZ-ROLDÁN  
Expert Translator

Annexed documents:

- (1) Third transcript of the public deed No. 815 issued by the Notary Public No. 10 in and for the state of Cancun, Francisco Óscar Lechón-Ruíz.
- (2) Authentication under folio No. SEGOB/SSIZN/0166-ZN/2020
- (3) Press releases dated August 10, 2020 and August 21, 2020.

NO TEXT

04455-4135-9254

● c.yepzroldan@gmail.com

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